


MEMO ENDORSED

April 24, 2023

VIA ECF

The Honorable Edgardo Ramos
United States District Court Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

The parties are directed to submit a final joint letter by May 3, 2023. SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: April 25, 2023
New York, New York

Re: *Haitian Bridge Alliance et al. v. U.S. Dep't of Homeland Sec. et al.*, No. 1:22-cv-08344-ER

Dear Judge Ramos:

Pursuant to the Court's Order, Dkt. No. 41, I write on behalf of all parties to provide the Court with a status report regarding the parties' progress in resolving the two Freedom of Information Act ("FOIA") requests, dated October 1, 2021 and February 25, 2022, as to defendants U.S. Department of Homeland Security ("DHS"), U.S. Customs and Border Protection ("CBP"), and U.S. Immigration and Customs Enforcement ("ICE") (collectively, the "DHS Defendants" or the "Government").

When the parties last submitted a letter to this Court on April 14, 2023, Dkt. No. 40, Plaintiffs were considering the revised proposal that the Government provided on April 12, 2023 as to the first two items of the October 1, 2021 FOIA Request. Plaintiffs wrote to the Government on April 19, 2023 and stated that they would accept the revised proposal with certain modifications that are important to Plaintiffs. The Government is considering those modifications. In addition, counsel for the Government have informed Plaintiffs that Defendant CBP will complete the processing of and produce any additional documents responsive to the third item of the October 1, 2021 FOIA Request by May 31, 2023 and should be able to provide a production schedule for the processing and production of any documents responsive to the February 25, 2022 FOIA Request on or about May 5, 2023.

The parties thus respectfully propose that they submit a final joint letter to the Court by May 3, 2023, regarding whether the remaining issues have been resolved or if the Court's intervention is required because the parties have not been able to reach agreement. The parties believe they should be able to inform the Court at that point of any issues that remain unresolved, if any.

We thank the Court for its consideration of this matter.

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Respectfully submitted,

/s/ Sarah Decker

Sarah Decker

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